

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

JOHNNY M. HUNT,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 3:23-cv-00243
)	
SOUTHERN BAPTIST CONVENTION;)	Chief Judge Campbell
GUIDEPOST SOLUTIONS LLC; and)	Magistrate Judge Frensey
EXECUTIVE COMMITTEE OF THE)	Jury Demand
SOUTHERN BAPTIST CONVENTION,)	
)	
Defendants.)	

**NOTICE OF SUPPLEMENTAL AUTHORITY IN SUPPORT OF PLAINTIFF’S
OPPOSITION TO DEFENDANTS’ MOTIONS FOR SUMMARY JUDGMENT**

Plaintiff Johnny M. Hunt, by and through the undersigned counsel, respectfully submits this Notice of Supplemental Authority to alert the Court to a January 8, 2025 opinion in *Garner v. S. Baptist Convention*, No. E2024-00100-COA-R3-CV, 2025 Tenn. App. LEXIS 4 (Tenn. Ct. App. Jan. 8, 2025), attached hereto as Exhibit A.

In *Garner*, the court ruled that the ecclesiastical abstention doctrine did not apply to claims relating to a Credentials Committee letter in a lawsuit brought against the Southern Baptist Convention (“SBC”), the Executive Committee of the SBC (“EC”), the Credentials Committee of the SBC, and Guidepost Solutions LLC for defamation, defamation by implication, false light invasion of privacy, and loss of consortium. *Id.* at *29.

The SBC and EC have attempted to invoke the ecclesiastical abstention doctrine to avoid liability relating to a Credentials Committee letter in this case based on nearly identical arguments rejected by the court in *Garner*. Compare *id.* at *27-28 (“The SBC and the

Credentials Committee argue that the [plaintiffs'] claims fall within the scope of the ecclesiastical abstention doctrine because they 'necessarily involve the impermissible secular determination as to whether' the inquiry into whether [the church] was in friendly cooperation with the SBC 'was proper.'"), *with* Doc. No. 224 at 30 ("[I]t also indisputably relates to a matter of church governance . . . whether Hiland Park was in friendly cooperation with the SBC.").

Dated: January 10, 2025

Respectfully submitted,

s/ Andrew Goldstein

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CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing Notice of Supplemental Authority in Support of Plaintiff's Opposition to Defendants' Motions for Summary Judgment to be electronically filed with the Clerk of the Court on January 10, 2025, using the CM/ECF system, which will automatically serve all counsel of record listed below:

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